

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law
100 Lafayette Street, Suite 501
New York, NY 10013

FRANKLIN A. ROTHMAN
JEREMY SCHNEIDER
ROBERT A. SOLOWAY
DAVID STERN

Tel: (212) 571-5500

Fax: (212) 571-5507

RACHEL PERILLO

March 10, 2025

Hon. George B. Daniels
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

RECEIVED
George B. Daniels
George B. Daniels, U.S.D.J.

Date: MAR 11 2025

Re: United States v. Freddy Abad
01 Cr. 831(GBD)

Dear Judge Daniels:

In 2001 I was the attorney for Freddy Abad on an indictment charging murder and related charges. In 2004 my partner, Franklin Rothman represented Mr. Abad at trial where Mr. Abad was ultimately convicted and sentenced to life in prison. Last week Mr. Abad called me and requested that I represent him on a motion for compassionate release.

I write now seeking to be appointed for that purpose. By making this application I do not pass on the merits of such an application beyond the undisputed fact that Mr. Abad has served approximately 24 years in prison. However, based on Mr. Abad's request, and his right to make such an application, I seek to be appointed to investigate his request and make a motion if such a motion is non-frivolous.

If your Honor has any questions regarding this application, please contact my office.

Respectfully submitted,

David Stern

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